

Deborah MartinNorcross <dmnorcross@martinnorcross.com>

Mon, Feb 11, 2008 at 1:44 PM

To: "numoh@umohlaw.com" <numoh@umohlaw.com>
Cc: "Harold Derschowitz (x263)" <HDERSCHOWITZ@lskdnylaw.com>

There are no rules about oral communications among counsel, particularly between co-defendants, nor am I going to create any. Harold now is aware of my request and, I am confident, will do whatever he concludes is in the best interests of his clients.

You did not e-mail any "bates-stamped documents" attachment to our clients' document requests. You did copy me on the e-mailed documents you sent in response to co-defendants' discovery requests. Until I receive what you represent you mailed last Monday, I cannot finalize the "deficiency letter" you have requested. Please keep in mind that a responding party is obligated to serve proper responses to discovery requests in the first instance.

Thank you.

numoh@umohlaw.com <numoh@umohlaw.com>
To: Deborah MartinNorcross <dmnorcross@martinnorcross.com>
Cc: "Harold Derschowitz (x263)" <HDERSCHOWITZ@lskdnylaw.com>

Mon, Feb 11, 2008 at 2:35 PM

Attached are the bates stamped documents that I have sent to all the parties. It is offered in response to Plus One's document requests. I am yet to receive confirmation from Harold, but I assume he has received them. As indicated in my responses, plaintiff is continuing to search for documents responsive to the demands of both defendants and will produce them as they become available. I hope to have any emails between the defendants and plaintiff available by the end of this week. Plaintiff is also working on obtaining her tax returns.

Please confirm receipt of the attached documents.

Uwem I. Umoh
255 Livingston Street,
4th Floor
Brooklyn, NY 11217
718.360.0527
718.360.1916 (Fax)